

# Exhibit A



#### New Parent World, LLC v. True to Life Prods., Inc. et al., 3:23-cv-08089 - Rule 68 Offer of Judgment

From Aaron K. Haar <akh@jaburgwilk.com>

Date Tue 12/17/2024 6:44 PM

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1 attachment (311 KB)

2024.12.17. Offer of Judgment - Heritage House.pdf;

#### Krystle:

Please see attached Rule 68 offer of judgment in the New Parent World matter.

Thank you,



### **Aaron K. Haar**

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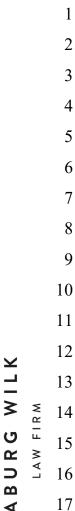
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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

New Parent World, LLC, a New Jersey for-profit corporation (d/b/a My Baby Experts),

Case No. 3:23-cv-08089-DGC

OFFER OF JUDGMENT

Plaintiff,

v.

True To Life Productions, Inc., an Arizona for-profit corporation; Heritage House '76, Incorporated, an Arizona for-profit corporation; Brandon Monahan, in his individual capacity,

Defendants.

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Pursuant to Rule 68, Fed. R. Civ. P., Defendants True to Life Productions, Inc., Heritage House '76, Incorporated, and Brandon Monahan hereby offer to allow judgment be taken against them by Plaintiff in this action in the amount of \$200,000.00 inclusive of all damages, costs, attorney fees, and interest, if any, sought in this action. This Offer of Judgment is made for the purposes specified in Rule 68 and is not to be construed either as an admission that Defendants are liable in this action or that Plaintiff suffered any damages.

In addition to the monetary judgment, if this offer is accepted, Defendants will, to the extent they have not already done so, remove any infringing content from any website over which they have control. Defendants are willing to enter into an agreement whereby

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Plaintiff may give notice of any content that it believes is infringing, and if within Defendants control, Defendants will remove such content within 10 days or provide notice that such content is not infringing. Defendants are willing to settle disagreements as to whether specific content is infringing by an expedited arbitration procedure whereby a mutually agreed upon arbitrator determines whether the content infringes.

If this offer is not accepted and the judgment Plaintiff finally obtains is not more favorable than the unaccepted offer, Plaintiff must pay Defendants' costs incurred after the date this offer is made. Pursuant to Rule 68, this Offer of Judgment is withdrawn if not accepted within 14 days.

DATED this 17th day of December, 2024.

#### Jaburg & Wilk, P.C.

/s/Aaron K. Haar Maria Crimi Speth Aaron K. Haar 1850 N. Central Avenue, 12th Floor Phoenix, AZ 85004

Attorneys for Defendants

**COPY** of the foregoing mailed and emailed this 7th day of June, 2024, to:

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